

ADDENDUM TO MEMORANDUM OF AGREEMENT DATED FEBRUARY 15, 2017
BETWEEN
U.S. CITIZENSHIP AND IMMIGRATION SERVICES
AND
GENERAL SERVICES ADMINISTRATION
PUBLIC BUILDING SERVICE, REGION 9

1. **Purpose.** This addendum supplements the original memorandum of agreement (MOA) between the Department of Homeland Security, U.S. Citizenship and Immigration Services (USCIS) and the General Services Administration, Public Buildings Service (GSA PBS), Pacific Rim Region (9) dated February 15, 2017 pertaining to the Chet Holifield Federal Building, 2400 Avila Road, Laguna Niguel, California (the facility). All terms of the original MOA remain in effect.
2. **Authority.** This agreement is entered into pursuant to the authority of both USCIS and the GSA PBS Regional Commissioner.
3. **Scope.** This addendum applies to the Chet Holifield Federal Building at 24000 Avila Road, Laguna Niguel, California and specifies:
 - a. Concentrations of asbestos in dust that require a remedial response action when observed.
 - b. Work practices to be employed to prevent the dispersal of friable asbestos within the facility during any and all work above the suspended ceiling.
 - c. Response actions to unintended releases of friable asbestos within the facility.
4. **Asbestos Dust Analysis.** Assessment of asbestos concentrations in dust shall be conducted in accordance with ASTM Standard D5755 Standard Test Method for Microvacuum Sampling and Indirect Analysis of Dust by Transmission Electron Microscopy for Asbestos Structure number Surface Loading (D5755). USCIS will conduct D5755 assessment in response to building events or conditions that could reasonably be considered to result in the accumulation of asbestos in dust above background concentrations.
 - a. Analysis results will be reported in structures/cm².
 - b. Samples shall be interpreted with a sample average of 10,000 structures/cm² as the threshold at or below which sampling results will be considered acceptable.
 - i. Samples from homogenous dust zones shall be averaged for the purposes of comparison to the of 10,000 structures/cm² threshold. Homogenous dust zones are physical sections of a continuous horizontal surface in the occupied space onto which dust accumulates from the same source(s) and in similar quantities.
 - ii. Sampling results will not be considered acceptable if the homogeneous dust zone sample averaging is greater than of 10,000 structures/cm² or if any individual sample from a homogenous dust zone exceeds a ceiling concentration of 50,000 structures/cm². Either of these conditions will be considered a dust exceedance.
 - c. Dust exceedance response
 - i. If a dust exceedance occurs, the area shall be isolated, access limited and the immediate area of the exceedance cleaned and D5755 samples collected before reoccupancy.

- d. Surface dust wipe sampling shall not be conducted except when microvacuum sampling is not feasible. In such instances, the surface shall be verified and agreed upon by both GSA and USCIS as appropriate for wipe sampling. Results shall be interpreted as above with 25,000 structures/cm² and 75,000 structures/cm² as homogenous dust zone average and ceiling values respectively.
5. **Above Ceiling Work.** Any and all work performed above the suspended ceilings at the facility shall be classified as OSHA Class III Asbestos Work. All individuals conducting this work will be appropriately trained. Work practices and engineering controls used as well as worker training requirements shall be in accordance with OSHA 29 CFR Part 1926.1101.
- a. A mobile containment unit, or equivalent engineering control will be utilized to perform above ceiling work. The regulated area will extend out 4 feet in all directions beyond the ceiling access area. A single layer of polyethylene plastic, minimum 4 mil, will be placed directly beneath the work area and extend out to cover at a minimum the entire regulated area.
 - b. The mobile containment unit shall be raised up to contact the ceiling grid but shall not be taped or attached to the ceiling panels. If the ceiling panel will withstand contact without damage and is in good condition, foam tape can be placed on the top edge of the enclosure. The enclosure will be lifted into place until a good seal to the ceiling tile is obtained. After the enclosure is in place a check for and cleanup of any debris generated by the enclosure installation will be performed. The unit shall always be set up and operated with a negative pressure system.
 - c. Following the removal of ceiling tiles the plenum side of ceiling tiles where work will occur will be lightly misted with amended water. Any bulk debris on top of ceiling tiles where work will occur will be placed in disposal bags. The surface of the plenum sides of the ceiling suspension system and ceiling tiles where work will occur will be HEPA vacuumed. Once scheduled work is completed the tile removed to access the above ceiling space will be wet wiped or HEPA vacuumed before being reinstalled.
 - d. In the event of an unintended release of friable asbestos the area shall be immediately isolated, access limited and the area of the release cleaned. These response actions shall be taken regardless of the source and cause of the release.
 - e. Following completion of work and cleanup of the regulated or unintended release areas, the area shall be considered acceptable and clear for reoccupancy once all post work clearance air sample results are below 0.010 f/cc by PCM. Post-work visual inspection and PCM clearance sampling will be performed by a third party not affiliated with GSA or the O&M contractor.
6. **Effective Date.** This addendum is effective the date signed by both USCIS and GSA.
7. **Duration.** This agreement remains in effect while the facility is under GSA control and is occupied by USCIS.
8. **Modification.** This addendum may be modified in writing whenever agreed by USCIS and GSA and signed by both parties.
9. **Termination.** This agreement may be cancelled by mutual written agreement of USCIS and GSA.

Agreed and Approved by:

(b) (6)

[Redacted Signature]

DATE:

4/11/17

Patricia Chang-Lynn

Deputy Regional Commissioner, GSA PBS, Pacific Rim Region

(b) (6)

[Redacted Signature]

DATE:

4/10/17

Michael D. Gibbs

Chief of Administration, USCIS

(b) (6)

[Redacted Signature]

DATE:

4/10/17

Hernando R. Perez

Lead Industrial Hygienist, USCIS

(b) (6)

[Redacted Signature]

DATE:

4/11/17

Kevin W. Santee

Industrial Hygienist, GSA